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Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JESSICA DEMESA, as an individual and on behalf of all others similarly situated.

Plaintiff,

v.

TREASURE ISLAND, LLC, Defendant. Case No.: 2:18-cv-02007-JAD-NJK

JOINT MOTION TO EXTEND TIME TO FILE JOINT DISCOVERY PLAN OR REQUEST TO CONTINUE STAY OF DISCOVERY

First Request

On September 22, 2021, this court granted the parties stipulation to extend time for plaintiff to file a second amended complaint and ordered the parties to file "either a joint proposed discovery plan or a request to continue the stay of discovery" by November 23, 2021. See ECF No. 76 1–2 ("Order"). The parties have attempted to meet and confer to align their discovery position and present a joint discovery plan to the court. However, lead counsel for the plaintiff has been out of the country in advance of the Thanksgiving holiday weekend, and despite the parties' good faith efforts, they have been unable to meet and confer. Accordingly, the parties respectfully request an extension until Tuesday, December 7, 2021, to submit a joint discovery plan or request to continue the stay of discovery. This additional time will allow the parties to meet and confer and, if necessary, provide a meaningful discussion of the factors set out in Kor Media Grp., LLC v. Green, 294 F.R.D. 579, 583 (D. Nev. 2013). This is the parties' first request to extend time to file a joint proposed discovery plan or request to continue the stay of discovery.

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DATED this 23rd day of November, 2021.

LAW OFFICES OF TODD M. FRIEDMAN P.C.

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NO FURTHER EXTENSIONS WILL BE GRANTED.

IT IS SO ORDERED. Dated: November 24, 2021

United States Magistrate Judge

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